

Feedback Form

Demand-Side Vision (DSV) and DR Participation Model Enhancements - September 20, 2023

Feedback Provided by:

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Date: 09/29/2023

To promote transparency, feedback submitted will be posted on the [Demand-Side Vision engagement webpage](#) unless otherwise requested by the sender.

Following the September 20, 2023 engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the topics during the DSV session. The webinar presentation and recording can be accessed from the [DSV engagement web page](#).

Please submit feedback to engagement@ieso.ca between September 29, with a deadline of **October 4, 2023**. If you wish to provide confidential feedback, please submit as a separate document, marked "Confidential". Otherwise, to promote transparency, feedback that is not marked "Confidential" will be posted on the engagement webpage.

DSV Objective and Principles

Topic	Feedback
Does the proposed Demand-Side Vision statement capture the key considerations for Demand-Side participation?	The vision statement for this effort should not only focus on the opportunities for demand response resources to provide value to the system but also explicitly speak to removing the barriers that exist for these resources to provide those services. Enel would recommend the following vision statement: <i>"To encourage the optimal contribution of all types of demand-side resources to a cost-effective, reliable power system while enabling consumers to manage their energy usage through the energy transition by removing barriers preventing demand-side resources from providing the wholesale services they are technically capable of providing."</i>

Topic	Feedback
Do the engagement principles align with the vision of this initiative?	These principles appear to align well with the vision statement.

Priority Areas

Topic	Feedback
Are the identified priority areas reflective of current participation issues and challenges?	The identified priorities are largely reflective of the challenges demand side resources are facing within the markets, but we look forward to seeing more detailed explanations of the identified priorities for consideration. We would stress that the three largest challenges that we see preventing demand side resources from cost-effectively providing services to the markets are (1) the inability to create multiple aggregations within a single zone, (2) auditing rules that misalign performance, penalties, and operational timelines and (3) the structure of the current participation models (HDR and dispatchable load) don't allow resource to provide all of the services they are capable of providing. These challenges increase risk and therefore the cost of participation, dissuading or preventing resources from entering the IESO's markets.

Topic	Feedback
Are there additional topics the IESO should consider?	IESO should consider what changes could be made to further open the reserve markets to demand response customers, including (1) improving the registration process for dispatchable loads, (2) allowing aggregators to provide reserves, (3) expanding participation beyond pilot studies, and (4) aligning energy market participation with resource characteristics, which will allow demand response resources to provide this service which they are technical capable and willing to provide.

Future Discussions

Topic	Feedback
Are you interested in joining focused sessions to prioritize and scope opportunities going forward?	Yes, please include Alex Worsley (alex.worsley@enel.com) and Allison Miller (Allison.miller@enel.com) in any future focused conversations about the scope and priorities of this engagement moving forward

General Comments/Feedback

- IESO has indicated that the November technical session will focus on Hourly Demand Response (HDR) participation model and that changes to the current model would be prioritized for action, while changes or opportunities for other types of participation models would be identified but not prioritized. As indicated on slide 5 of IESO’s September 20 presentation, demand response resources **currently** participate in Ontario’s power system in several ways and participate in IESO’s markets in a number of ways beyond the Hourly Demand Response model. We believe that there are potential changes to other participation models, particularly the Dispatchable Load participation model, that should be evaluated alongside potential changes to the HDR model. We believe that all potential changes that meet the engagement’s vision statement should be considered within scope, especially in the early stages of the effort. We would encourage IESO to expand the scope technical sessions to include background and discussion related to the HDR and the dispatchable load models.
- While we agree that there may be projects better suited to be addressed in the short term (like issues with the audit process), as IESO identifies longer term opportunities for future Demand-Side participation models, it would be helpful for the IESO to provide context for how long they expect it would take to develop such a solution and when do they believe it is the appropriate time to move forward with exploring the topic.
- As IESO considers resource performance, we would encourage the IESO to not only look at the underlying technology but the market framework and metrics by which the resource is being assessed.

- We highly encourage the IESO to not only better understand how new DR technologies can be incorporated into future participation models, but also make concrete recommendations and next steps as to how those technologies can be incorporated.